

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

X Corp.,

Plaintiff,

Case No. 3:23-CV-03698-WHA

v.

BRIGHT DATA LTD.,

Defendant.

DECLARATION OF DAVID A. MUNKITTRICK

I, David A. Munkittrick, declare as follows:

1. I am an attorney at Proskauer Rose LLP in New York. I submit this declaration pursuant to Local Rule 7-11 in support of Bright Data’s Administrative Motion to Expedite its Disqualification Motion and Stay the Case Remainder.

2. On June 10, 2024, I emailed X’s counsel seeking consent to the relief set forth in in Bright Data’s Administrative Motion to Expedite Its Disqualification Motion and Stay the Case Remainder.

3. On June 11, 2024, X’s counsel confirmed that it does not oppose the request to expedite the Disqualification Motion (as long as it gets a “reasonable time” to file its Opposition), but that it takes “no position” on the request to Stay the Case Remainder.

Dated: June 12, 2024

Respectfully submitted,

/s/ David A. Munkittrick

David A. Munkittrick
PROSKAUER ROSE LLP
Eleven Times Square
New York, New York 10036
(212) 969-3000
dmunkittrick@proskauer.com